

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL FLOOD, JR. and ALECIA : Civil Action No.: 2:18-cv-1310  
FLOOD, individually and as Parents and :  
Natural Guardians of T.F., a minor, :

Plaintiffs : Honorable Mark R. Hornak, J.

vs. :

GEORGE VILLEGAS, JR. and PAM :  
VILLEGAS, individually and as Parents :  
and Natural Guardians of MEGHAN :  
VILLEGAS; DAVID and CHRISTY :  
SHERK, individually and as Parents and :  
Natural Guardians of K.S., a minor; DAVID :  
and CHRISTINE SEAMAN, individually :  
and as Parents and Natural Guardians of :  
C.S., a minor; CRIS and KIMBERLY :  
SALANCY, individually and as Parents :  
and Natural Guardians of E.S., a minor; :  
DAVID and LYNN REINA, individually :  
and as Parents and Natural Guardians of :  
H.R., a minor; SENECA VALLEY :  
SCHOOL DISTRICT; BUTLER COUNTY :  
DISTRICT ATTORNEY'S OFFICE; and :  
BUTLER COUNTY, PENNSYLVANIA, :

Defendants. :

**DEFENDANTS GEORGE, PAM, AND MEGHAN VILLEGAS' MOTION  
TO STRIKE SCANDALOUS AND IMPERTINENT MATTER PURSUANT TO  
FED.R.CIV.P. 12(f)**

Defendants George, Pam, and Meghan Villegas, through their undersigned  
counsel, respectfully submit the following Motion to Strike, pursuant to Fed.R.Civ.P  
12(f), stating the following:

1. The Plaintiffs' use of the moniker "mean girls" is scandalous and impertinent.
2. Defendants George, Pam, and Meghan Villegas join with Defendants Chris and Kimberly Salancy, and their daughter, E.S.'s Motion to Strike (Document 34) and join in the prayer for the requested relief.
3. The foregoing Motion to Strike has been discussed with all other counsel of record in this matter. Plaintiffs intend to oppose this Motion. The other Defendants in this case do not oppose this Motion.

WHEREFORE, Defendants George, Pam, and Meghan Villegas respectfully request that this Honorable Court enter the attached Order directing that the phrase "mean girls" be stricken from the Complaint.

Respectfully Submitted,

/s/ Joseph V. Charlton  
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D. Robert Marion Jr., Esq.  
Charlton Law  
617 South Pike Road  
Sarver, PA 16055

Counsel for Defendants  
George, Pam, and Meghan  
Villegas

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of December, 2018, I have filed electronically the foregoing Motion to Strike pursuant to Fed.R.Civ.P. 12(f) with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorney(s) of record:

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The following individuals have been served via first class mail, postage pre-paid, this 4<sup>th</sup> day of December 2018.

David Reina  
5A River Road  
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*Individually and as parent of H.R.*

Lynn Reina  
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*Individually and as parent of H.R.*

Respectfully Submitted,

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